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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHANDA BARLOW,

Defendant.

No. 3:24-cr-00011-JMK-MMS

COUNT 1:

CONSPIRACY TO DISTRIBUTE AND  
POSSESS WITH INTENT TO DISTRIBUTE  
CONTROLLED SUBSTANCES

Vio. of 21 U.S.C. §§ 846 and 841(a)(1),  
(b)(1)(C)

COUNT 2:

ATTEMPTED POSSESSION OF A  
CONTROLLED SUBSTANCE WITH  
INTENT TO DISTRIBUTE

Vio. of 21 U.S.C. § 841(a)(1), (b)(1)(C)

COUNT 3:

POSSESSION OF A CONTROLLED  
SUBSTANCE WITH INTENT TO  
DISTRIBUTE

Vio. of 21 U.S.C. § 841(a)(1), (b)(1)(C)

COUNT 4:  
MONEY LAUNDERING CONSPIRACY  
Vio. of 18 U.S.C. § 1956(h)

**INDICTMENT**

The Grand Jury charges that:

COUNT 1

Beginning on a precise date unknown to the Grand Jury, but no later than February 2022, and continuing to July 5, 2023, within the District of Alaska and elsewhere, the defendant, SHANDA BARLOW, did knowingly and intentionally combine, conspire, confederate, and agree with others both known and unknown to the Grand Jury to distribute and possess with the intent to distribute controlled substances, to wit: a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (fentanyl).

All in violation of 21 U.S.C. §§ 846 and 841(a)(1), (b)(1) (C).

COUNT 2

Beginning on or about November 1, 2022, and continuing until on or about November 4, 2022, within the District of Alaska, the defendant, SHANDA BARLOW, did knowingly and intentionally attempt to possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidiny] propenamide (fentanyl).

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

### COUNT 3

On or about May 1, 2023, within the District of Alaska, the defendant, SHANDA BARLOW, did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl) and methamphetamine.

All of which is in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

### COUNT 4

Beginning on or about a date unknown but by at least August 4, 2022 and continuing through July 15, 2023, within the District of Alaska and elsewhere, the defendant, SHANDA BARLOW, did knowingly and intentionally combine, conspire, confederate, and agree with other persons both known and unknown to the grand jury to commit offenses against the United States in violation of 18 U.S.C. § 1956, to wit:

- (a) to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of a specified unlawful activity, that is, the unlawful distribution of controlled substances in violation of 21 U.S.C. § 841(a)(1), with the intent to promote the carrying on of the unlawful distribution of controlled substances, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i); and
- (b) to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the

proceeds of specified unlawful activity, that is, the unlawful distribution of a controlled substance in violation of 21 U.S.C. § 841(a)(1), knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

#### OVERT ACTS OF THE CONSPIRACY

In furtherance of the conspiracy and to effect and accomplish its objectives, and as evidence of the agreement, the defendant and others known and unknown to the Grand Jury committed the following acts, among others, in the District of Alaska and elsewhere:

	<u>Date</u>	<u>Financial Transaction</u>
a.	November 22, 2022 to June 29, 2023	Opened and maintained Wells Fargo account number xxxxxx3729 that she used to launder approximately \$88,000 in the proceeds of drug distribution
b.	December 23, 2022	Western Union wire transfer of \$3,000.00 from an individual in Dillingham, AK
c.	January 4, 2023	Western Union wire transfer of \$3,000.00 from an individual in Dillingham, AK
d.	April 15, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
e.	April 15, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico

f.	April 15, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
g.	April 16, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
h.	April 17, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
i.	April 17, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
j.	April 18, 2023	Western Union wire transfer of \$2,000.00 to an individual in Culiacán, Mexico
k.	May 6, 2023	Western Union wire transfer of \$2,000.00 to an individual in Tijuana, Mexico
l.	May 6, 2023	Western Union wire transfer of \$2,000.00 to an individual in Tijuana, Mexico

All of which is in violation of 18 U.S.C. § 1956(h).

A TRUE BILL.

s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

s/ Christopher D. Schroeder  
CHRISTOPHER D. SCHROEDER  
Assistant U.S. Attorney  
United States of America

s/ S. Lane Tucker  
S. LANE TUCKER  
United States Attorney  
United States of America

DATE: 1/17/2024